



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8**

1595 Wynkoop Street
Denver, CO 80202-1129
Phone 800-227-8917
www.epa.gov/region08

MAR 2 2015

Ref: 8EPR/N

Mr. Jason Kling
Richfield District Ranger
Fishlake National Forest
U.S. Forest Service
115 East 900 North
Richfield, UT 84701

Re: Monroe Mountain Aspen Ecosystems Restoration Project Draft Environmental Impact
Statement CEQ # 20150010

Dear Mr. Kling:

The U.S. Environmental Protection Agency Region 8 has reviewed the Monroe Mountain Aspen Ecosystems Restoration Project (Monroe Mountain) Draft Environmental Impact Statement (EIS) prepared by the U.S. Forest Service. Our comments are provided for your consideration pursuant to our responsibilities and authorities under Section 102(2)(C) of the National Environmental Policy Act (NEPA), 42 U.S.C. Section 4332(2)(C), and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609.

Based on the EPA's procedures for evaluating potential environmental impacts on proposed actions and the adequacy of the information, the EPA is rating the action alternatives an "LO" – Lack of Objections. Our review did not identify any objectionable impacts with this project. This letter documents our concerns with the organization of the Draft EIS and includes recommendations for the Final EIS. A full description of the EPA's rating system can be found at www.epa.gov/compliance/nepa/comments/ratings.html.

PROJECT BACKGROUND AND DESCRIPTION

Monroe Mountain, located in Fishlake National Forest in south-central Utah south of Richfield, has approximately 175,000 acres of National Forest lands and 11,000 acres of private inholdings. Historically, aspen ecosystems dominated the vegetation distribution on Monroe Mountain. This is important because aspen is a keystone species, supporting the highest level of biodiversity for interior western forests. Aspen ecosystems have been in decline throughout the Intermountain West during the twentieth century. On Monroe Mountain, this decline is mostly attributed to the following: (1) conifer encroachment caused by the reduction of wildland fire due to increased fire suppression and (2) domestic and wild browsing by cattle, sheep, elk and deer.

The Forest Service is proposing to restore aspen ecosystems by using a combination of prescribed fire and mechanized thinning treatments to promote the regeneration and recruitment of aspen communities. The no action alternative and four action alternatives are analyzed in the Draft EIS. The proposed action

is similar for all of the action alternatives. What varies in each alternative is the acreages of mechanical thinning and prescribed fire that would be treated and the mileage of temporary roads proposed. No alternative was identified as the preferred alternative.

EPA CONCERNS AND RECOMMENDATIONS

The EPA commends the Forest Service for their comprehensive design criteria and mitigation measures that are well described in Chapter 2. We also appreciate the discussions about the monitoring, treatment sequencing, browsing thresholds and adaptive management measures they will use to ensure protection of the environment.

While the EPA does not have concerns regarding the environmental impacts of this project, we had great difficulty in making this conclusion because of how the Draft EIS was organized. The manner in which the analysis of impacts was presented was unique in our experience. Instead of the more typical listing of project impacts by natural or social resource (e.g., air quality, water quality), this document organized project impacts under seven key issues brought up during the public scoping process. The key issues included impacts to wilderness attributes and roadless area characteristics and degradation of Bonneville cutthroat trout and Boreal toad habitat, among others. The impact assessments for some typical vegetation management project resources were found in unexpected places in the document and some were not present in the Draft EIS itself.

On page 111, the Draft EIS states, “The detailed analyses presented in this document are only for those resources that were identified as issues in chapter 1 and 2. All other resource analyses can be found in the specific specialists resource reports that are hereby incorporated by reference....” For example, although prescribed burning is a part of the proposed action, the impacts to air quality from this activity are not described in the Draft EIS. The air quality report can only be found on the Forest Service’s website. The analysis on climate change is at the end of the vegetation report, also only available on the website and not intuitively where one would expect to find it.

To be clear, the EPA supports the use of “incorporation by reference,” a tool for referring to other EISs, research literature, or other highly technical documents to streamline EISs. However, these technical support documents include impact assessment relevant to the decision for this project, and they contain information that reviewers will likely want to examine. We recommend that any reports pertaining to the preparation of the EIS that would be useful to reviewers be included as appendices to this Draft EIS and not just incorporated by reference, consistent with regulations at 40 CFR 1502.21 and guidance provided by the Council on Environmental Quality’s *40 Most Asked Questions* (Questions 25 [a] and [b]). For the major environmental resources that are analyzed in vegetation management NEPA documents, such as water quality, please summarize the resource specialist’s reports and include these summaries and impact conclusions in the Final EIS.

To more clearly disclose the potential environmental and social impacts of the proposed actions described in the Monroe Mountain DEIS, the EPA recommends reorganizing Chapter 3 Affected Environment and Environmental Consequences by resource so that the reader can easily locate and understand the impacts of this project. The EPA would be happy to discuss this approach with the Forest Service.

The statement on page 31, "This analysis tiers to the Forest's Final EIS and LRMP (USFS 1986)" indicates that the Monroe Mountain Draft EIS tiers off a 29 year-old document. The EPA recommends that the Final EIS address how it will assure that tiering from a 1986 Land and Resource Management Plan appropriately considers all the environmental resource, policy and regulatory changes since then.

We noted that the document uses forestry terms throughout, which the lay reader does not readily understand, and there is no glossary explaining these words. Examples are "jack-strawing," "seral," and "basal area." We suggest adding a glossary to the Final EIS, so that lay readers can better understand what the Forest Service is planning to do and the analyses of project impacts.

Finally, the proposed action includes "mechanical treatment," but there is no explanation of exactly what that means. We recommend adding a more detailed discussion about exactly what kind of "mechanical treatments" will be implemented to the beginning of section 2.2.1 in the Final EIS.

Thank you for the opportunity to provide comments on the Monroe Mountain Aspen Ecosystems Restoration Draft EIS. If you have any questions or would like to discuss our comments, please contact me at 303-312-6704 or Carol Anderson of my staff at 303-312-6058.

Sincerely,



Philip S. Strobel
Acting Director, NEPA Compliance and Review Program
Office of Ecosystems Protection and Remediation

cc by email: Ms. Amy Torres, Forest Service

